THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

Case no. 3:18-CV-01293
Judge Eli J. Richardson
Barbara D. Holmes, Magistrate Judge
) Jury Demand

JOINT MOTION FOR ENTRY OF AGREED ORDER FOR THE RELEASE OF MEDICAL AND MENTAL HEALTH RECORDS

Comes now the parties, by and through counsel, and hereby move this court to enter the proposed Agreed Order Allowing Inspection and Copying of Medical and Mental Health Records of Joseph Allen Bauer attached hereto as **Exhibit 1**. In support of their motion, the parties state as follows:

The attorneys for Defendants need to gather decedent Joseph Allen Bauer's medical and mental health records in connection with their defense of this case. Although such records could be gathered with the use of subpoenas, they can be gathered more efficiently and cost effectively with the use of an agreed order. Based on the foregoing, the parties respectfully move this court to enter the proposed order attached hereto as Exhibit 1.

Respectfully submitted,

MACPHERSON & YOUMANS

By: s/ Robert D. MacPherson

Robert D. MacPherson, # 022516

119 Public Square
Lebanon, Tennessee 37087
(615) 444-2300
rdmacpherson@macyolaw.com

HUDSON, REED & CHRISTIANSEN, PLLC

By: __s/ D. Randall Mantooth_
Nicholas C. Christiansen, #30103
D. Randall Mantooth, #13875
16 Public Square North
Murfreesboro, TN 37130
(615) 893-5522
nchristiansen@mborolaw.com
rmantooth@mborolaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Joint Motion for Entry of Agreed Order for the Release of Medical and Mental Health Records has been forwarded by electronic means via the court's electronic filing system to:

Robert D. MacPherson, Esq. MacPherson & Youmans, P.C. 119 Public Square Lebanon, TN 37087 rdmacpherson@macyolaw.com

on this 10th day of January, 2020.

By: <u>s/D. Randall Mantooth</u> D. Randall Mantooth